

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

**EXXON MOBIL CORPORATION**

§

§

§

§

**V.**

§

**CASE NO. 1:25-cv-00011-MJT**

§

§

**ROBERT ANDRES BONTA A.K.A**

§

**ROB BONTA, IN HIS INDIVIDUAL**

§

**CAPACITY; SIERRA CLUB, INC.;**

§

**SURFRIDER FOUNDATION, INC.;**

§

**HEAL THE BAY, INC.; BAYKEEPER,**

§

**INC.; AND INTERGENERATIONAL**

§

**ENVIRONMENT JUSTICE FUND LTD.**

§

**PROPOSED ORDER ON DEFENDANT HEAL THE BAY, INC.'S 12(b)(2), (3), AND (6)  
MOTION TO DISMISS**

After considering Defendant Heal the Bay, Inc.'s 12(b)(2), (3), and (6) Motion to Dismiss, and the response, the Court GRANTS Heal the Bay, Inc.'s 12(b)(2) and (3) Motion to Dismiss.

SIGNED on \_\_\_\_\_, 2025.

\_\_\_\_\_  
Hon. Michael Truncale